

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Troy Davis, Lynn James, Marvin Owens
(Deceased), Booker T. Brown (Deceased)
and Newton Williams, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL
Properties LLC, successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL BAP and BLACK CLIENTS OF
GPW

PROPOSED ORDER OF COURT

AND NOW this _____ day of August 2022, upon consideration of the Motion of
Goldberg, Persky & White, P.C. for Relief Under Article XXVII under the Settlement
Agreement. It is hereby Ordered that the following Relief is Granted.

1. Declaring that unequivocal confirmed BAP diagnoses for monetary award be paid;
2. Issue an Order enjoining unequivocal confirmed BAP diagnoses being sent for review
with the AAP;

3. Issue an Order requiring the Claims Administrator and Special Masters to defer to the articulated medical judgments of BAP physicians in the context of an unequivocal diagnosis;
4. Order race-normed players' age be tolled from the time they first tested under the Program so they may be placed in the same position that they would have been in at the time if race-norming had not been used;
5. Order that race-normed players who cannot be tolled and who experienced Civil Rights and Due Process violations be sent back to mediation to ensure that they be made whole; and,
6. Appointing the undersigned as Special Class Counsel to oversee the above-referenced relief and authorizing an appropriate award of attorney's fees and expenses for these efforts.

By: _____, J.